

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

In re:)
SIAMAK LOGHMANI) Case No. 18-10781-KHK
Debtor.) Chapter 13
)

**OBJECTION TO CONFIRMATION OF PLAN,
NOTICE OF OBJECTION TO CONFIRMATION OF PLAN, AND
NOTICE OF SCHEDULED HEARING ON THIS MOTION**

Heatherbrook Homeowners Association, a secured creditor in part, by counsel, has filed this objection to confirmation of your Chapter 13 plan dated March 27, 2018. The cause for this is as follows:

1. Creditor's Proof of Claim was timely filed May 2, 2018, showing a total claim of \$9,394.46 with \$8,936.66 as secured and \$457.80 as unsecured.
2. Debtor's Chapter 13 Plan fails to include Creditor as a secured creditor. Creditor should be listed in Paragraph 6 of the Chapter 13 plan as a creditor secured by Debtor's principal residence.
3. Debtor has failed to include the currently accruing assessment installments in his proposed budget.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not wish the court to grant the relief sought in the motion, or if you want the court to consider your views on the objection, then on or before five business days prior to the hearing date, you or your attorney must:

File with the court, at the address shown below, a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1 (H). Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing. If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above. You must also mail a copy to the persons listed below.

Aimee T. H. Kessler, VSB #44890
Segan, Mason & Mason, P.C.
7010 Little River Turnpike, #270
Annandale, VA 22003
(703) 354-9170
Attorney for Creditor

Attend the hearing scheduled to be held on May 10, 2018 at 9:30 a.m. in Courtroom #II, United States Bankruptcy Court, 200 South Washington Street, Alexandria, Virginia 22314. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

A copy of any written response must be mailed to the following persons:

Heatherbrook Homeowners Association
c/o Segan, Mason & Mason, P.C.
7010 Little River Tpk., Ste. 270
Annandale, VA 22003

Clerk of the Court
United States Bankruptcy Court
200 South Washington Street
Alexandria, VA 22314

Thomas P. Gorman, Chapter 13 Trustee
300 N. Washington Street, Ste. 400
Alexandria, VA 22314

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: May 2, 2018

/s/ Aimée T. H. Kessler
Aimée T. H. Kessler, VSB #44890
SEGAN, MASON & MASON, P.C.
7010 Little River Turnpike, Suite 270
Annandale, VA 22003
Telephone: (703) 354-9170
Facsimile: (703) 354-7638
E-mail: akessler@seganmason.com
Counsel for Heatherbrook Homeowners Association

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice and Objection to Confirmation of Chapter 13 Plan and Notice of Scheduled Hearing were sent via electronic noticing to:

Thomas P. Gorman, Chapter 13 Trustee
300 N. Washington Street, Ste. 400
Alexandria, VA 22314

Nathan A. Fisher, Esquire
Fisher-Sandler, LLC
3977 Chain Bridge Road, #2
Fairfax, VA 22030
Attorney for Debtor

this 2nd day of May 2018.

/s/ Aimée T. H. Kessler
Aimée T. H. Kessler